

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA
Plaintiff,

v.

GEORGIANNA A.M. GIAMPIETRO
Defendant.

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Case No.: 2:19-cr-00013

Chief Judge Waverly D. Crenshaw, Jr.

DEFENSE PROPOSED JURY INSTRUCTIONS (Disputed)

COMES NOW, Defendant, Georgianna Giampietro, by and through undersigned counsel and provides to this Court the defense Disputed Jury Instructions for:

- Count One - Attempting to Provide Material Support to A Foreign Terrorist Organization Instruction;
- Unanimity Instruction for Count One;
- Count Three - Tampering with Evidence Instruction;
- Implicit Bias Instruction;¹ and
- First Amendment Protected Speech Instruction²

A Word/Wordperfect version of these instructions will be emailed to the Court per its Order in D.E. 173.

Respectfully submitted this 18th day of August, 2021.

/s/ Charles D. Swift

CHARLES D. SWIFT

Pro Hac Attorney for Giampietro

Constitutional Law Center for Muslims in America

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¹ Counsel understands that this Court, as a matter of practice, gives the Implicit Bias Jury Instruction included in the Agreed Instructions. Counsel respectfully submits the attached Implicit Bias Jury Instruction for the Court's consideration.

² Counsel recognizes that this instruction may require tailoring based on the state of the evidence at the close of trial.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of August, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Charles D. Swift

CHARLES D. SWIFT

Pro Hac Attorney for Georgianna Giampietro